

OK TO
enter
201
7/31/07

Remarks

Reconsideration of the application is respectfully requested.

The undersigned attorney and Thomas Enright wish to thank the Examiner for the courtesies extended by him during the July 26, 2007 telephone conference. This Response reflects the discussion that occurred during the July 26, 2007 telephone conference.

The Examiner rejected claims 1-19 under 35 USC 102(a) as being anticipated by Keoshkerian et al., US Patent 6,767,974. This rejection is respectfully traversed. The present claims are directed to the use of a continuous mode polymerization reactor which can accomplish a continuous mode of operation. As discussed on page 7, lines 30-33, of the present specification, the terms "continuous" and "batch" are used in their ordinary sense in the chemical arts to differentiate the two basic types of manufacturing processes. The use of a continuous mode polymerization reactor is not disclosed in Keoshkerian and is not obvious because emulsions are typically not stable enough for use with a continuous mode polymerization reactor. But applicants' miniemulsion is stable enough for use with a continuous mode polymerization reactor. Thus, the use of a continuous mode polymerization reactor in the present process is a significant and unexpected advantage which renders the present claims patentable over Keoshkerian.

As argued by Thomas Enright during the telephone conference, Keoshkerian's use of the term "continuous phase" (in for example Abstract) refers to a component of the miniemulsion, NOT to a continuous mode polymerization reactor. There is no disclosure of a continuous mode polymerization reactor in Keoshkerian. In fact, Keoshkerian discloses the use of a batch reactor in Example 4.

As discussed on pages 8-10 of the present application, FIG. 1 and FIG. 2 depict representative apparatus (2, 2A) to carry out embodiments of the present process. Regarding the claim language "flowing the miniemulsion within a continuous mode polymerization reactor," the continuous mode polymerization reactor is depicted in FIG. 1 and FIG. 2 as a tubular-flow reactor (8).